



RE: EXTERNAL: Re: SAP clarification

Bath, Bill to: Harry Craig

"Matsushita, Gene S", "Lynden Peters

Cc: (Lynden.Peters@arcadis-us.com)", Dennis Faulk, Christy Brown,
Linda Meyer, Mary Queitzsch, Cami Grandinetti, Thabet Tolaymat,

09/17/2012 04:21 PM

Table 2. Test Matrix

			QA/QC Samples		RCRA Landfill								
Analyte Name	Analyte Abbreviation	Method	Field/Trip Blank	Duplicate	Sump	Vent #1	Vent #2	Vent #3	Upwind of RCRA Landfill Outside Fence	Downwind of Landfill RCRA Outside of Fence	RCRA Utility Building	Nutrient Shack	CERCLA Bul
Extractive Sampling and Analyses													
Acetylene	C ₂ H ₂	EPATO-3M	1	1	2 ⁵	1 from the location 1 ft away at the height of the vent and 1 inside the RCRA vent, both as indicated by the worst cases in the Field Instrument Monitoring			1	3	1 from worst case on site building location as indicated in the Field Instrument Monitoring		

Harry- This was not a "new interpretation" of what the SAP requires, but instead an inconsistency between the text and Table 2. An excerpt from Table 2 is attached, and it states that for the 3 RCRA vents, the samples will be "1 from the location 1 ft away at the height of the vent and 1 inside the RCRA vent, both as indicated by the worst cases in the Field Instrument Monitoring." The attached excerpt is for acetylene so that you can see the column headings, but there is identical language for the other gases.

Having not heard from EPA on this issue until this morning, we went with the more conservative approach and collected extractive lab samples from within all 3 RCRA vents.

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From: Harry Craig [mailto:Craig.Harry@epamail.epa.gov]
Sent: Monday, September 17, 2012 9:57 AM
To: Bath, Bill
Cc: Matsushita, Gene S; Lynden Peters
(Lynden.Peters@arcadis-us.com); Dennis Faulk; Christy Brown; Linda Meyer; Mary Queitzsch; Cami Grandinetti; Thabet Tolaymat
Subject: EXTERNAL: Re: SAP clarification

Bill,

This proposal of extractive sampling at one only vent and one manhole at each landfill is unacceptable to EPA. Based on the text in the SAP Section 2.4, EPA expects that all RCRA Landfill vents and all CERCLA Landfill vaults/manholes will have extractive laboratory analysis sampling conducted.

2.4 RCRA and CERCLA Landfill Vents, Sumps and Pump Stations: Field Monitoring and Extractive Sampling

The hand-held surveys and extractive sampling will be conducted at each source

location: at the RCRA landfill sump and three vents, and at the CERCLA landfill's four manholes and two lift stations.

These are some of the most important samples for assessing quantitative gas concentrations at the highest potential sources at the landfills. One lab sample at each landfill is not acceptable to adequately assess the extent of gas migration from the landfills. Frankly, EPA has some serious concerns about your contractor's execution of this SAP, after we went through multiple drafts to get a somewhat "clean" version to execute in the field. Now we get these additional "interpretations" of what the SAP means.

Regards,

Harry

▼ "Bath, Bill" ---09/15/2012 01:01:47 PM---Harry- The SAP has an inconsistency between Table 1 and the text on the number of extractive lab sa

From: "Bath, Bill" <bill.bath@lmco.com>
To: Harry Craig/R10/USEPA/US@EPA
Cc: "Matsushita, Gene S" <gene.s.matsushita@lmco.com>, "Lynden Peters (Lynden.Peters@arcadis-us.com)" <Lynden.Peters@arcadis-us.com>
Date: 09/15/2012 01:01 PM
Subject: SAP clarification

Harry- The SAP has an inconsistency between Table 1 and the text on the number of extractive lab samples. Table 1 specifies 1 RCRA vent sample based on "worst case" instrument screening and 1 worst case CERCLA manhole sample. The text states that all 3 RCRA vents and all CERCLA manholes will be sampled. Arcadis ordered sampling equipment based on Table 1. Please approve sampling the "worst case" RCRA vent and CERCLA manhole consistent with Table 1.

I left you an identical voice mail message on your cell phone at 11:45am today.

We agreed yesterday on sampling the middle RCRA vent under SAP Section 2.3 (sampling in breathing zones), so we are focusing efforts today on completing this sampling and the RCRA sump while we resolve the issue about Section 2.4 sampling.

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